

ALDEN F. ABBOTT
General Counsel

EVAN ROSE, Cal. Bar No. 253478
MATTHEW D. GOLD, N.Y. Bar No. 2073963
LAURA FREMONT, Cal. Bar No. 159670
EMILY COPE BURTON, Cal. Bar No. 221127
COLIN HECTOR, Cal. Bar No. 281795
901 Market Street, Suite 570
San Francisco, CA 94103
Email: erose@ftc.gov; mgold@ftc.gov;
lfremont@ftc.gov; eburton@ftc.gov;
chector@ftc.gov
Tel: (415) 848-5100; Fax: (415) 848-5184

MARICELA SEGURA, Cal. Bar No. 225999
D. EMILY WU, Cal. Bar No. 293670
10990 Wilshire Blvd., Suite 400
Los Angeles, CA 90024
Email: msegura@ftc.gov; ewu@ftc.gov
Tel: (310) 824-4343; Fax: (310) 824-4380

MICHAEL J. DAVIS, N.Y. Bar No. 3049095
600 Pennsylvania Ave., NW
Mail Drop CC-10528
Washington, DC 20580
Email: mdavis@ftc.gov
Tel: (202) 326-2458; Fax: (202) 326-3259

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Jeffrey M. Tillotson (SBN 139372)
TILLOTSON LAW
1807 Ross Avenue, Suite 325
Dallas, TX 75201
Telephone: (214) 382-3040
jtillotson@TillotsonLaw.com

Pete Marketos (*pro hac vice*)
REESE MARKETOS LLP
750 North Saint Paul Street, Suite 600
Dallas, TX 75201
Telephone: (214) 382-9810
pete.marketos@rm-firm.com

Michael K. Kellogg (*pro hac vice*)
Mark C. Hansen (*pro hac vice*)
KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK P.L.L.C.
1615 M Street, NW, Suite 400
Washington, DC 20036
Telephone: (202) 326-7900
mkellogg@kellogghansen.com
mhansen@kellogghansen.com

Ryan M. Sandrock, SBN 251781
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, CA 94104
Telephone: (415) 772-1200
Email: rsandrock@sidley.com

Attorneys for Defendant
AT&T MOBILITY LLC

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AT&T MOBILITY LLC, a limited liability
company,

Defendant.

Case No. 14-cv-04785-EMC

**STIPULATED REQUEST AND
[PROPOSED] ORDER FOR FURTHER
STAY OF DISCOVERY**

Pursuant to Civ. L.R. 6-1, 6-2, and 7-12, Plaintiff Federal Trade Commission (“FTC”) and Defendant AT&T Mobility LLC (“AT&T”) hereby stipulate to and request a stay of discovery through November 21, 2019. The facts underlying this requested stay are set forth in the declaration accompanying this stipulated request.

On August 2, 2019, the parties notified the Court that they had reached an agreement in principle on injunctive provisions and the amount of monetary relief. Dkt. #179. The parties requested a stay until August 23 for the purposes of (1) finalizing the order provisions related to the administration of consumer redress and (2) securing final approval of the settlement agreement from AT&T. *Id.* The Court granted the parties’ request for a stay. Dkt. #181.

The parties have now finalized the redress administration provisions and secured AT&T’s final approval of the settlement agreement. Accordingly, the parties request that the Court grant a 90-day stay, through November 21, to provide the FTC’s Commissioners with an opportunity to review and vote on the proposed settlement. The parties will notify the Court once the FTC’s Commissioners have voted on the proposed settlement.

The Court has previously issued the following orders granting stipulated requests to change time:

- Request to extend the deadlines to file the motion to dismiss and the opposition and reply thereto (Dkt. #26);
- Request to extend the deadline to file AT&T’s answer (Dkt. #58);
- Request to extend the deadline to file a joint proposal for phased discovery (Dkt. #103);
- Requests to postpone the CMC, primarily in connection with appellate review in this matter (Dkt. #117, 119, 121, 123, 127, 130, 133, 138, 161);
- Request to stay all deadlines in this case in connection with the lapse in appropriated funding for the FTC (Dkt. #164); and

- Request to stay discovery to finalize settlement provisions related to the administration of consumer redress and secure final approval of the settlement agreement from AT&T (Dkt. #181).

Respectfully submitted,

Dated: August 23, 2019

/s/ Evan Rose

Evan Rose
Matthew D. Gold
Laura Fremont
Maricela Segura
Emily Cope Burton
Michael J. Davis
D. Emily Wu
Colin Hector

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

(The filer attests that concurrence in the filing of this document has been obtained from the other signatory.)

/s/ Peter D. Marketos

Peter D. Marketos
Jeffrey M. Tillotson

Counsel for Defendant
AT&T MOBILITY LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HONORABLE EDWARD M. CHEN
UNITED STATES DISTRICT COURT JUDGE
NORTHERN DISTRICT OF CALIFORNIA